

C.A.R.B.:

After reviewing the recently received e-mail (Diesel off-road equipment measure preliminary regulatory concepts), I would like to make the following suggestions:

Any, and all voluntary or mandated efforts to reduce "soot" emissions on off-road diesel equipment by owners, lessors, renters, etc. can, and should be monitored yearly; using the existing P.S.I.P. procedures to ensure compliance and verify the opacity readings that a piece of equipment registers.

The thing that has made the On-road program so successful in reducing "soot" from diesel vehicles is the (required) yearly testing of the Periodic Smoke Inspection Program. I've interviewed dozens of fleet owners over the last six years; and all of them have said that the State's mandated yearly opacity testing is the driving force that keeps them on their toes in maintaining and repairing their diesel-powered trucks. They say that they have done increased maintenance; less (illegal) adjusting; and more early-retirement of non-compliant vehicles. All this to make sure that they don't incur fines or other negative attention from the CARB.

The yearly required testing could be addressed and explained in the section of your proposal entitled: "Annual compliance demonstration" on page 4 of your e-mail. It would fit right in with the other "enforcement" criteria that is necessary to ensure fleetowner compliance. The PSIP system of yearly opacity testing would ensure your success in this new endeavor; that will prove to be a serious undertaking. The amount of pollution from diesel smoke (soot) that comes from the off-road (construction) equipment is greatly more significant, I believe, than the combined pollution of on-road vehicles (trucks). This yearly testing, as I've

stated before, will make sure that the construction equipment fleet owners will take your attempts seriously enough to "get it done".

Thank you so much for allowing me to provide you with my input on this much-needed new program. I have performed over 6,000 opacity tests in the last six and one-half years, and can truly testify to the effectiveness of the PSIP (program). The off-road equipment would provide a slightly more difficult challenge to perform the actual testing; but it is nothing that a little more training and hard work in the field couldn't accomplish.

Thank you again, and feel free to contact me with any questions or comments.

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